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March 15, 1985

Docket No. 50-305
License No. DPR-43
EA 85-23 .

Wisconsin Public Service
Corporation
ATTN: Mr. P. D. Ziemer, President
and Chief Executive Officer
Post Office Box 19002
Green Bay, WI 54307-9002

Gentlemen:

This refers to the special safety inspection conducted by Mr. R. L. Nelson of this office during the period of December 19, 1984 through January 15, 1985, of activities at the Kewaunee Nuclear Power Plant authorized by NRC Operating License No. DPR-43. This special inspection concerned circumstances surrounding your discovery on December 18, 1984, that the automatic transfer feature provided to ensure adequate suction head for the safety injection pumps during accident conditions, had been disabled. The initial findings of this inspection were discussed on January 7, 1985 during an enforcement conference held in the NRC Region III offices between you and other members of your staff and Mr. A. B. Davis and other members of the Region III staff.

The inspection identified three violations of NRC requirements, which are described in the enclosed Notice. They involved the failure to meet a technical specification for post accident operability of the safety injection pump system, the failure to have adequate surveillance procedures which contributed to the failure to meet technical specification requirements, and the failure to make a required report to the NRC within the four hours required.

The violation involving the failure to meet the requirements of technical specification 3.3.a.1.G involved the failure to correctly reposition a selector switch at the conclusion of a surveillance test, which resulted in an inoperable automatic interlock in the safety injection pump system. This violation, item A in the Notice of Violation, is classified at Severity Level III in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, as revised, 49 FR 8583 (March 8, 1984). Although civil penalties are considered for Severity Level III violations, a civil penalty is not proposed in this case. Your immediate corrective action involved placing the selector switch in the correct position, investigating the cause of the switch misalignment, discussing the problem with plant department heads the following day, reviewing the problem with plant maintenance personnel, and having the Operations Superintendent speak with all the operating shift crews concerning the event. Your long term corrective actions involved a revision to the surveillance procedure involved, a review and evaluation of the current safety injection system hardware, planned modification of the control room

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planned modification of the control room safety injection status panel and a scheduled review of all plant surveillance procedures. We also considered your prior good performance in the areas of operations and surveillance. This good performance was demonstrated by Category 1 ratings during the recent Systematic Assessment of Licensee Performance (SALP 4).

In your response to this letter, please follow the instructions in the Notice. Your response should specifically address corrective actions you have taken or planned to improve the management effectiveness for ensuring that technical specification requirements are met and for ensuring personnel performing safety-related activities are properly trained. Your written reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is appropriate.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Enclosure:
Notice of Violation

cc w/encl:

E. R. Mathews, Senior Vice
President, Power Supply
and Engineering
C. W. Giesler, Vice President,
Power Production
D. C. Hintz, Manager,
Nuclear Power
C. R. Steinhardt, Manager
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John J. Duffy, Chief
Boiler Section
Ness Flores, Chairperson
Wisconsin Public Service
Commission

RIII

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RIII

Notus

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Tambling
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RIII

WKS
Schultz
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Davis

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JKeppler, RIII

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